IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	•	CRIMINAL NO.
v.	:	DATE FILED:
JEFFREY WRIGHT	:	VIOLATIONS:
		18 U.S.C. § 471 (making counterfeit
	:	federal reserve notes - 1 count)
		18 U.S.C. § 472 (passing counterfeit
	:	federal reserve notes - 1 count)
		18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From in or about April 2006 to in or about April 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

JEFFREY WRIGHT

with intent to defraud, falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$50,000 in counterfeit \$1, \$5, \$10, \$20, \$50 and \$100 Federal Reserve Notes.

In violation of Title 18, United States Code, Section 471.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

From in or about April 2006 to in or about April 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

JEFFREY WRIGHT

with intent to defraud, possessed, concealed, passed and attempted to pass, and aided and abetted the possession and passing of, falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$50,000 in counterfeit \$1, \$5, \$10, \$20, \$50 and \$100 Federal Reserve Notes.

In violation of Title 18, United States Code, Sections 472 and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections
471 and 472, set forth in this indictment, defendant

JEFFREY WRIGHT

shall forfeit to the United States of America: (a) pursuant to Title 18, United States Code, Section 492, any and all counterfeits of any coins or obligations of the United States, and any articles, devices and other things made, possessed and used in these violations, and any material or apparatus used or fitted or intended to be used in the making of such counterfeits, articles, devices and things; and (b) pursuant to Title 18, United States Code, Section 982(a)(2)(B), and all property , real and personal, constituting and derived from proceeds obtained directly or indirectly as a result of such violation. This property shall include, but be limited to:

- 1. All property used to make, forge, counterfeit and alter any obligation and other security of the United States, including, but not limited to: (a) one HP 3 in 1 printer/copier/scanner, model 750, serial no. MY28MD41OM; (b) four packets of Mead Brand construction paper; (c) three packs of CFT Detection pens; (d) six HP tri-color ink cartridges; (e) two HP black ink cartridges; and (f) one X-Acto paper cutter.
- 2. All property, real and personal, involved in or traceable to the violations charged in Counts One and Two of this indictment;
- 3. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:
 - (a) cannot be located upon the exercise of due diligence;

- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant JEFFREY WRIGHT up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 492 and 982, and Title 28, United States Code, Section 2461.

	A TRUE BILL:
	FOREPERSON
PATRICK L. MEEHAN	